

COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY

TOWN OF FRAMINGHAM REQUEST FOR)	
DETERMINATION OF RATES APPLICABLE TO)	D.T.E. 02-46
TRANSPORTATION AND TREATMENT OF SEWAGE)	
PURSUANT TO INTERMUNICIPAL AGREEMENT)	

TOWN OF FRAMINGHAM'S RESPONSE TO THE DEPARTMENT'S
FOURTH SET OF INFORMATION REQUESTS

The Town of Framingham ("Framingham") responds to the
Department's Fourth Set of Information Requests as follows.

D.T.E. 02-46: DTE F-4-1

Please provide a copy of the Town of Framingham's first progress report to MWRA regarding implementation of the tasks by the November 2002 settlement agreement.

RESPONSE TO DTE F-4-1

Please see attached document. This response was provided by counsel for the Town of Framingham.

D.T.E. 02-46: DTE F-4-2

Please explain to what extent the measures that Framingham is taking pursuant to the MWRA settlement agreement may reduce corrosive conditions within the Town's own sewerage facilities. Please identify which, if any, of the shared facilities might benefit from these measures.

RESPONSE TO DTE F-4-2

There are several measures currently being undertaken by the Town to reduce sulfide formation in its wastewater collection system. These measures include:

- Increased sewer cleaning throughout the collection system;
- Stricter regulation of discharges of oil and grease into the collection system from commercial sewer users;
- The addition of grease-reducing bacteria to the collection system at the Speen Street pumping station and at one other location near the intersection of Worcester Road and Edgell Road. These bacteria will enhance the natural decomposition of oil and grease, reducing the likelihood of sulfide formation;
- Installation of nutrient addition systems to reduce sulfide concentrations through addition of a nutrient that oxidizes existing sulfide concentrations and prevents further sulfide formation. The first system is currently being installed in the Saxonville wastewater pumping station. This station discharges wastewater directly to the MWRA Arthur Street facilities.

These sulfide mitigation measures are intended to reduce the concentrations of sulfide throughout the Framingham collection system. Hydrogen sulfide gas is the major cause of damage to collection systems, and reducing the concentration of dissolved wastewater sulfide will reduce the gaseous hydrogen sulfide concentrations. These reductions will prolong the life of all facilities, but in particular those facilities in the region of the MWRA Arthur Street facility.

If sulfide loads in the Farm Pond Interceptor are not reduced through the above-referenced measures, Framingham intends to install nutrient addition equipment in the Worcester Road wastewater pumping station. The Worcester Road pumping station discharges to the Farm Pond Interceptor, and any improvements in the sulfide load will reduce the sulfide damage in that pipe.

Other measures will be implemented depending on the results of the above mitigation measures, and on the success of Ashland's own mitigation measures, if any. These could include structural modifications, increased operation and maintenance regimens, and further nutrient addition systems.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

D.T.E. 02-46: DTE F-4-3

Please refer to Mr. Geribo's pre-filed direct testimony at 31.

- a. How does Framingham define "peak flow"?
- b. Upon what measurements should Ashland's and Framingham's peak flows be based? How would such measurements be obtained?
- c. Does "ratio of Ashland peak flow to Framingham peak flow" mean Ashland/Framingham or Ashland/(Ashland + Framingham)?

RESPONSE TO DTE F-4-3

- a. In the formula referenced at page 31 of Mr. Geribo's testimony, the numerator of the formula ("Ashland's peak flow") was intended to be the peak flow permitted under the existing IMA. Thus, if Framingham were to carry out a capital upgrade to the Farm Pond Interceptor, Ashland's peak flow would be 2.5 MGD, the maximum amount Ashland is permitted to discharge to that pipe. The denominator of the formula was intended to be Ashland's peak flow plus Framingham's peak flow, which together would be equal to the capacity of the pipe.
- b. See response to (a) above. Ashland's peak flow is as set forth in the IMA. Framingham's peak flow would be determined by subtracting Ashland's peak flow from the capacity of the particular pipe involved.
- c. As set forth above, the ratio is Ashland/(Ashland + Framingham).

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

D.T.E. 02-46: DTE F-4-4

Please refer to Framingham's response to DTE F-3-7. Identify the location(s) along the shared facilities where chemical additions take place.

RESPONSE TO DTE F-4-4

As referenced in the response to DTE F-4-2, the Town is adding a grease-reducing bacteria to the collection system at the Speen Street wastewater pumping station, and at a Town-owned building near the intersection of Worcester Road and Edgell Road. These bacteria decompose grease and other sewer materials to reduce the odors and corrosion caused by wastewater containing these substances. The flows from the second insertion point ultimately discharge to the Farm Pond Interceptor, which has been identified as a shared facility.

This response was provided by Stephen Geribo and Paul Brinkman of SEA Consultants, Inc.

D.T.E. 02-46: DTE F-4-5

Please refer to proposed Exh. DTE-2 (MWRA Project Update, Odor Corrosion Control Study, Framingham Extension Sewer (Feb. 1998), provided by Ashland as an attachment to its response to Framingham's Information Request 1-20. Figure 5-7 of this document indicates the locations of several flow meters within the Framingham sewerage system.

- a. Describe the location of meter 4 in greater detail (using street and sewer references).
- b. Are any of flow meters 1 through 4 still in place? If so, are they still collecting data, or are they capable of being reactivated? Describe the meters and their monitoring capabilities.

RESPONSE TO DTE F-4-5

- a. The flow meters identified in the named exhibit are described within the document titled *Final Report for Tasks 3 & 4 to Determine the Extent of Odor and Corrosion*. This document was prepared by the MWRA to evaluate the sources and causes of corrosion in its facilities in the Framingham, Natick, and Ashland areas. The description of the flow meter location #4 can be found on page 4-14. The description indicates that the MWRA placed the meter on the Beaver Dam Interceptor between Beaver Street and Arthur Street. No further detail is given.
- b. The flow meters were installed as part of the aforementioned study by the MWRA. Based upon the information provided in proposed Exh. DTE-2, it appears that these flow meters were installed on a temporary basis by subcontractors to the MWRA for the purposes of gathering information for the MWRA study. We believe the temporary meters have been removed. We do not have further information regarding the meters and their capabilities.

This response was provided by Paul Brinkman and Stephen Geribo of SEA Consultants, Inc.

D.T.E. 02-46: DTE F-4-6

Refer to Framingham's response to DTE F-3-12(a). What share of Framingham's Total Costs are "Indirect Costs"? Does Framingham have the ability to track this share for the last five years? If so, please provide this information

RESPONSE TO DTE F-4-6

The percentage share varies. In 1999, as reflected on proposed Ex. FR-18, indirect costs (\$870,996) constituted approximately 36% of total costs (\$2,402,197), excluding the MWRA assessment. In 2000, indirect costs (\$953,434) also constituted approximately 36% of total costs (\$2,666,621). In 2001, indirect costs (\$1,032,165) constituted approximately 45% of total costs (\$2,276,217). In 2002, indirect costs (\$982,201) constituted approximately 40% of total costs (\$2,478,419).

This response was provided by Robert Addelson, Framingham's Chief Financial Officer.

D.T.E. 02-46: DTE F-4-7

Refer to Framingham's response to DTE F-3-12(b). Please explain what costs are included in the "Other Benefit Costs" category.

RESPONSE TO DTE F-4-7

The "other benefits" category was intended to capture those indirect personnel costs that are applicable to the operation and maintenance of the sewer system, but are not categorized as salary or insurance costs. These costs can include education reimbursement costs, pensions, social security, paid time off, and other employment-related benefits.

This response was provided by Paul Brinkman and Stephen Geribo of SEA Consultants, Inc.

D.T.E. 02-46: DTE F-4-8

Refer to Framingham's response to DTE F-3-7. Please indicate under what circumstances Framingham uses specialized contractors to assist in the maintenance of the system.

RESPONSE TO DTE F-4-8

The circumstances under which Framingham uses specialized contractors are highly variable. Relevant considerations include:

- the complexity of the work;
- the availability of equipment;
- the availability of personnel;
- the time constraints of the work; and
- the location of the work.

Framingham does not use outside contractors to perform routine maintenance work. Framingham has used outside contractors to perform the following types of specialized work:

- Inspection services. The Town has from time to time contracted with contractors specializing in sewer inspection work;
- Repair and rehabilitation contractors. The Town is responsible for the operation and maintenance of over 275 miles of gravity sewer, in addition to 50 wastewater pumping stations and associated force mains. Several specialized contractors are required to maintain this equipment in optimal condition. Plumbers, electricians, heavy equipment contractors, pipe installers, masons, paving contractors, and landscapers are just a few of the types of contractors retained by the Town to assist in the maintenance of the wastewater collection system.
- Chemical systems contractors. The Town currently is using an outside contractor to install a chemical addition system at the Saxonville pumping station.

This response was provided by Robert Angelo, Framingham's Water and Sewer Superintendent.

D.T.E. 02-46: DTE F-4-9

Refer to Framingham's response to DTE F-3-7. For each of the routine maintenance tasks listed in this response, please indicate the approximate frequency of work. In addition, for each of the routine maintenance tasks listed in this response, indicate if these maintenance tasks are performed on a fixed schedule or if the work is triggered by other factors. If the work is triggered by other factors, indicate what these factors are.

RESPONSE TO DTE F-4-9

The frequency of this work varies depending on Town resources and the needs of the sewer collection system. Factors which trigger the work include loss of service, emergency operating conditions, the need to conduct studies, regulatory requirements, and the need to perform system repairs and rehabilitation.

Framingham conducts routine maintenance on pipes, manholes, and associated structures on a daily basis, using a crew of 4-6 workers and a supervisor. Framingham owns and uses on a daily basis a rodding machine, a vacuum truck, a flushing machine, and a camera. Areas of the system are inspected and cleaned on a rotating basis, so that all 275 miles of gravity sewer are cleaned at least once a year. Framingham also cleans the siphons in the system on a quarterly basis.

Easement maintenance typically is done on a yearly basis. Every 5-10 years, however, Framingham takes additional steps to thoroughly control the growth of vegetation that may impact sewer operation.

Framingham also maintains a separate pump crew, of four workers and a supervisor, responsible for maintaining the pumps and all associated structures in the pumping stations.

This response was provided by Robert Angelo, Framingham's Water and Sewer Superintendent.

D.T.E. 02-46: DTE F-4-10

Refer to Framingham's response to DTE F-3-16 and proposed Exhibit FR-18.

- a. Provide a detailed description of those sewer-related costs that are included in the category labeled "Personal Services."
- b. Provide a detailed description of those sewer-related costs that are included in the category labeled "Operations."
- c. For the 2000 and 2001 fiscal years, explain what is meant by the category of sewer-related costs labeled "Transfer for Articles and Capital Projects."

RESPONSE TO DTE F-4-10

- a. Personal Services costs include salaries and wages paid to full-time and part-time employees of the Water and Sewer Department, including overtime and pay differentials (e.g., holiday and weekend pay).
- b. Operations costs include utility costs, repairs and maintenance costs, rental/lease costs, professional and technical services, communications costs, office supplies, vehicular supplies, public works supplies, and professional development expenses, among other things.
- c. Those two entries reflect capital expenditures for specific capital projects. The expenditures were included in the operations section for informational purposes only, and Framingham does not contend that those expenditures should be included as O&M expenses in either year.

This response was provided by Robert Addelson, Framingham's Chief Financial Officer.

Respectfully submitted,
THE TOWN OF FRAMINGHAM,
By its attorneys,

Christopher J. Petrini
Erin K. Higgins
Conn Kavanaugh Rosenthal Peisch
& Ford, LLP
Ten Post Office Square
Boston MA 02019
(617) 482-8200
(617) 482-6444 (fax)

DATED: _____

175681.1